

**TEMPLATE FOR SUBMISSION OF TEXTUAL PROPOSALS DURING THE 28<sup>TH</sup> SESSION:  
COUNCIL - PART I**

Please fill out one form for each textual proposal which your delegation(s) wish(es) to amend, add or delete and send to [council@isa.org.jm](mailto:council@isa.org.jm).

- 1. Name of Working Group:  
President's Text**
- 2. Name(s) of Delegation(s) making the proposal:  
Interoceanmetal Joint Organization**
- 3. Please indicate the relevant provision to which the textual proposal refers.**

The original version of **Regulation 94**

**Para 3** The Standards *"may/must include both **qualitative and quantitative standards**"*

We would like to echo view expressed by the previous speakers - standards can be quantitative and/or qualitative.

Then the same paragraph, *"**standards must/may include the methods, processes and technology required to implement the Standards**"*, we think this is too prescriptive, there may be many ways to achieve compliance with standards and if the contractor can demonstrate that it can achieve compliance using whatever scientifically sound technology or method he has at hand, the contractor should be allowed to use this technology or method.

**Regulation 94 Alt 1 para 6** dealing with inconsistency between Standards and a Plan of Work.

We believe this para is important from the operational point of view as it sets out the procedure for the Contractors in case of change of Standards.

## **Schedule**

### **Use of terms and scope**

*"Resources" means all solid, liquid or gaseous mineral resources, [mineral-bearing ore, associated minerals, or mixture thereof] in situ in the Area at or beneath the seabed, including: (a) polymetallic nodules, defined as any deposit or accretion of nodules, on or below the surface of the deep seabed, which contain metals such as manganese, nickel, cobalt and copper; (b) polymetallic sulphides, defined as hydrothermally formed deposits of sulphides and accompanying mineral resources in the Area which contain concentrations of metals such as copper, lead, zinc, gold and silver; and (c) cobalt crusts, defined as cobalt-rich ferromanganese hydroxide/oxide **deposits formed from direct precipitation of Minerals from seawater onto hard substrates containing concentrations of metals such as cobalt, titanium, nickel, platinum, molybdenum, tellurium, cerium and other metallic and rare earth elements.***

We believe this part [bold] should be deleted, we know already that there is not only direct precipitation from seawater, there are evidences of bacterial involvement in this process (see for example: Skowronek et al 2021, <https://doi.org/10.3390/min11080868>)